

Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

In the Matter of

| | | |
|--------------------------------|---|---------------------|
| Amendment of Section 73.202(b) |) | |
| Table of Allotments |) | MM Docket No. _____ |
| FM Broadcast Stations |) | RM - _____ |
| (Ft. Collins, Westcliffe and |) | |
| Wheat Ridge, Colorado) |) | |

RECEIVED

To: Chief, Audio Division
 Office of Broadcast License Policy
 Media Bureau

JUN 11 2002

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

PETITION FOR RULE MAKING

Tsunami Communications, Inc., ("TCI"), licensee of KTCL, Ft. Collins, Colorado, by its counsel, hereby requests that the Commission amend the FM Table of Allotments to delete Channel 227C at Ft. Collins and allot Channel 227CO to Wheat Ridge, Colorado as that community's first local service. If this Petition is granted, TCI will file an application to modify the license of KTCL to specify operation on Channel 227CO at Wheat Ridge. Ft. Collins will retain local aural service, and any area losing service from KTCL as a result of these changes will remain well served. Accordingly, the net result of this petition will be a new first local service at Wheat Ridge, Colorado, a preferential arrangement of allotments.

In support hereof, TCI states as follows:

I. Technical Analysis

1. As demonstrated in the Technical Exhibit, Channel 252A can be allotted to Wheat Ridge, Colorado at coordinates 39-40-18 North Latitude, 105-07-32 West Longitude consistent with Section 73.207 of the Commission's Rules provided a substitution of channels is made at Westcliffe, Colorado, *See* Figure 1. TCI propose the substitution of Channel 249A for vacant

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Channel 227A at Westcliffe. *See* Figure 1. A 70 dBu signal can be provided to Wheat Ridge from the proposed reference point. *See* Figure 5. The relocation of KTCL to Wheat Ridge will result in a predicted net loss of population to 154,763 persons within the 60 dBu signal from the station. *See* Figure 2. However, the Commission should recognize that due to the mountainous terrain in this area the actual loss in reception is significantly less. Taking terrain into account, there is actually a net gain in population within the 60 dBu of 43,980 persons. Nevertheless, under Priority 3 a first local service to Wheat Ridge is preferred over a net loss in secondary coverage area which falls under Priority 4. *See* Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982). The loss area will continue to be well served by more than five aural services. *See* Figures 3-4.

II. Change in Community of License

2. TCI desires to change the community of license for Station KTCL from Ft. Collins to Wheat Ridge to provide a first local service under the guidelines set forth in Amendment of the Commission's Rules Regarding Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 3870 (1989), recons. granted in part, 5 FCC Rcd 7094 (1990) ("Community of License"). First, the proposed use of Channel 227CO at Wheat Ridge is mutually exclusive with the current use of Channel 227C at Ft. Collins. *See* Figure 1. Ft. Collins will not be deprived of its only local service because it is currently served by three other stations. The provision of a first local service at Wheat Ridge (population 32,913)² under Priority 3 will result in a preferential arrangement of allotments over the retention of a fourth local station at Ft. Collins under Priority 4. *See* Revision of FM Assignment Policies and Procedures, 90 FCC 2d 88 (1982).

² All population figures are taken from the 2000 U.S. Census.

3. Ft. Collins is the central city in the Ft. Collins Urbanized Area. Wheat Ridge is located in the Denver Urbanized Area. Thus, Station KTCL is not relocating from a rural to an urban area. The station is already located in an urban area. In fact, KTCL's current 70 dBu contour already covers 100% of the Ft. Collins and Boulder Urbanized Areas and more than 50% of the Denver Urbanized Area. Nevertheless, TCI is providing a showing that Wheat Ridge is independent of Denver under the factors set forth in Faye and Richard Tuck, 3 FCC Rcd 5374 (1988). As to relative size, Wheat Ridge's population is 5.9% of the size of Denver. As to proximity, although Wheat Ridge is located adjacent to Denver, it is located in Jefferson County whereas Denver is located in Denver County. As to signal population coverage, the 70 dBu signal will reach 100% of the Denver Urbanized Area.

4. The Commission will consider eight factors in assessing the independence of a specified community: (1) the extent to which the community residents work in the larger metropolitan area, rather than the specified community; (2) whether the smaller community has its own newspaper or other media that covers the community's local needs and interests; (3) whether community leaders and residents perceive the specified community as being an integral part of, or separate from, the larger metropolitan area; (4) whether the specified community has its own local government and elected officials; (5) whether the smaller community has its own telephone book provided by the local telephone company or zip code; (6) whether the community has its own commercial establishments, health facilities, and transportation systems; (7) the extent to which the specified community and the central city are part of the same advertising market; and (8) the extent to which the specified community relies on the larger metropolitan area for various municipal services such as police, fire protection, schools, and libraries. Faye and Richard Tuck, 3 FCC Rcd 5374, 5378 (1988). All eight factors need not

favor the applicant; however, if a majority of the factors demonstrate that the specified community is distinct from the urbanized area, the Commission will treat it as an independent community. Id.; Parker and Port St. Joe, Florida, 11 FCC Rcd 1095, ¶¶ 9-11 (1996) (finding that the proposed community was independent, although it lacked its own telephone directory and local newspaper, and was included in the urbanized area's market by Arbitron); accord Jupiter and Hobe Sound, Florida, 12 FCC Rcd 3570, ¶ 3 (1997) (citing Parker and Port St. Joe, Florida).

5. In this case, the evidence presented, evaluated in light of Commission precedent in other change of community allocation proceedings, supports a finding that Wheat Ridge is independent from the Denver, Colorado Urbanized Area.

(1) *Extent to which the residents of Wheat Ridge, Colorado, work in the City of Wheat Ridge.* The population of Wheat Ridge was 32,913 (2000 U.S. Census Bureau). This represents an increase of 12.8% from the 1990 U.S. Census figure of 29,419 for Wheat Ridge. According to the 1990 U.S. Census Database, the last year for which statistics are available, 3,079 of the 14,667 workers work, or 21.0%, in their place of residence. According to the city web site, www.co.wheatridge.co.us, in the nine square mile area that composes Wheat Ridge, there are more than 3,200 businesses licensed to the City of which about one-half are locally owned and operated. The larger businesses located in Wheat Ridge include Exempla Medical Center, Jolly Rancher Candies, Rocky Mountain Bottling, Volant Skis & Aggression Snowboards and Star Guide Corporation. *See Exhibit 1.*

(2) *Newspapers and other media that cover Wheat Ridge's needs and interests.* Wheat Ridge is served by the weekly newspaper *Wheat Ridge Transcript*. Published

each Thursday, the newspaper contains news and information of special interest to the residents of Wheat Ridge. There is also an on-line edition available at <www.jeffconews.com/WR/html>.

The City of Wheat Ridge maintains its own webpage at <www.ci.wheatridge.co.us>. By accessing this webpage, city residents may access a wide variety of facts and events concerning Wheat Ridge including information regarding city officials, public services, public and committee meetings, development, job opportunities, public schools and community events. Sample pages are attached.

(3) *Community leaders and residents perceive Wheat Ridge as separate from Denver.* The City of Wheat Ridge has its own unique identity and history that are separate from that of Denver. Located in Jefferson County, Wheat Ridge is a growing community located adjacent to the Interstate 70 transportation corridor along the Rocky Mountains. Wheat Ridge was founded in 1859 by a small group of farmers who came searching for precious metals and began a rural village. By the late nineteenth century, the abundant water and good growing soil led to the development of a small farming community. Until World War II, Wheat Ridge was a major supplier of fresh produce to Denver and the surrounding region. As the city grew, the carnation production became a major growth industry. Wheat Ridge was incorporated in 1969. In 1977, the residents of Wheat Ridge adopted a home rule charter. According to the city website, today, Wheat Ridge is “a mature city with a strong sense of community and history. The City’s individuality, manageable scale and tree lined streets combined with its convenient location ... makes the City a desirable place to live and do business.” See Exhibit 1.

(4) *Wheat Ridge has its own local government and elected officials.* The government of the City of Wheat Ridge functions independently of any other governmental units, and operates under a council-manager form of government. The mayor, city clerk and city

treasurer are elected to four year terms. There are eight City Council members, two from each of the four districts, and are elected for four year terms. The City Council is the legislative body for the City and has all the legislative powers and functions of municipal government. The City Council appoints a City Manager to run the daily affairs of the city. Among the departments are: Police; Fire; Parks and Recreation; Human Resources; Public Works; Finance; and Engineering. Among the municipal services provided by the City are: business licenses, planning, zoning, road and bridge maintenance, city attorney, snow removal, economic development, urban renewal and housing authority. The 2002 fiscal year budget for the City of Wheat Ridge is \$15,000,000. See Exhibit 1.

(5) *The City of Wheat Ridge has its own zip code and separate governmental listings in the local telephone company.* The zip codes designated exclusively for the City of Wheat Ridge are 80002, 80033, 80034, 80212, 80214, 80215 and 80403. The U.S. Postal Service operates the Wheat Ridge Main Post Office at 4210 Wadsworth Boulevard in Wheat Ridge. See Exhibit 1. According to Dema Brianza of the Wheat Ridge City Clerk's office, residential and business listings for Wheat Ridge are found in the Denver Metropolitan Telephone Directory published by Qwest, which contains a separate section for the Wheat Ridge government listings. In addition, two separate smaller directories are published by Quest that contain separate Wheat Ridge listings.

(6) *The City of Wheat Ridge has its own commercial establishments and health facilities.* A few of these businesses identify with the community by using "Wheat Ridge" in their name, for example: Wheat Ridge Lanes, First Bank of Wheat Ridge, Wheat Ridge Auto Services, Wheat Ridge Cyclery, Wheat Ridge Muffler and Brakes, Wheat Ridge Optical and Wheat Ridge Realtors. Wheat Ridge retail businesses include: John Elway Ford West, Larry's

Amoco, Blooming Fool (florist), Edward's Meats, Advantage Wireless, Inc., Peabury Coffee, Ltd. and Wal-Mart. Wheat Ridge has numerous dining establishments such as: Blue House Tavern, Gemini Restaurant, Minilla and Vern's Restaurant & Lounge. Banking services are provided by many establishments such as: Wells Fargo Bank, Vectra Bank of Colorado, Commercial Federal Bank and Foothills Bank. Wheat Ridge has numerous inns and hotels such as Interstate 17 Inn, Pine Springs Cabins and American Motel. *See Exhibit 1.*

A number of health care providers are located in the City of Wheat Ridge. Medical services are provided by Wheat Ridge Internal Medicine, Exempla Wheat Ridge Medical Center, Western Urologic Association and Mountain Pulmonary Care and community residents have a variety of options to take care of their medical needs. The Lutheran Medical Center is located in Wheat Ridge. Dental care is provided by Wheat Ridge Dental Clinic, Wheat Ridge Oral Surgeon and Helm Dental & Denture Clinic, as well as by various other local dentists. Veterinary services may be obtained from Wheat Ridge Animal Hospital. *See Exhibit 1.*

Wheat Ridge is also home to more than two dozen religious organizations, such as Wheat Ridge United Methodist Church, Wheat Ridge Presbyterian Church, Wheat Ridge Evangelical Church, Applewood Baptist Church and St. Peter and Paul Church. *See Exhibit 1.* There are many civic organizations and committees in Wheat Ridge such as Wheat Ridge Historical Society, Optimist Club and Kiwanis Club. Community activities and events that occur in the City of Wheat Ridge include Carnation Festival and Arts Festival.

(7) *Wheat Ridge is a separate and distinct advertising market from Denver.* According to the City Government staff and the newspaper serving Wheat Ridge, businesses in Wheat Ridge advertise in *Wheat Ridge Transcript* which enable them to reach the residents of

Wheat Ridge and does not involve directly Denver media sources. Residents may also access the City's webpage to learn about community events and news. Thus, the residents of Wheat Ridge do not need to seek out Denver media sources in order to find what is happening in their community.

(8) *The City of Wheat Ridge has its own library and its police and fire protection are provided independent of any other jurisdiction.* The Jefferson County Public Library System operates the Wheat Ridge Public Library which serves the local population. The Library is open six days a week. It has a meeting room, computer and Internet access and a book-on-tape and video collections. The library has several programs for children.

The Wheat Ridge Historical Society Library is a source of documents, public records and archival materials concerning the history of Wheat Ridge and city government. The library is open four days a week.

The Jefferson County Public School system provides public school education to the children of Wheat Ridge. There are six public elementary schools located in Wheat Ridge. There are two public middle schools with one under construction in Wheat Ridge. There is a public high school located in Wheat Ridge. There are also several private schools. *See Exhibit 1.*

The City of Wheat Ridge maintains its own police and fire departments. Created in 1925, Wheat Ridge Fire Department is a volunteer organization with a fire chief and fire marshal operating two stations located in Wheat Ridge. The Wheat Ridge Fire Department provides a variety of fire prevention and safety, ambulance, paramedic, search and rescue, EMT, HAZMAT and other services to city residents as well as educational programs. The Wheat Ridge

Police Department is composed of a chief of police, deputy chief and sixty-seven officers. *See* Exhibit 1.

The City of Wheat Ridge has a full range of parks and recreation services that are available to its residents. Clear Creek, which runs through the City, is surrounded by a system of parks operated by the Wheat Ridge Parks & Recreation Department. The City has acquired large tracts of land along the creeks to be preserved. According to the city website, there are over 140 acres of developed parks with an additional 250 acres of open space in the City. The City opened in 2000 the 71,000 square foot Wheat Ridge Recreation Center. Many sports programs are offered through the Parks & Recreation Department, such as tennis, soccer, softball, baseball and basketball and operates the Wheat Ridge Senior Citizen Community Center. Within the city, there are tennis courts, mini-parks and basketball courts. *See* Exhibit 1

III. CONCLUSION

The allotment of Channel 227CO to Wheat Ridge, Colorado is in the public interest because Wheat Ridge (population 32,913) will receive its first local service and Ft. Collins will retain three local services. A channel substitution for a vacant channel at Westcliffe, Colorado will be required.

Respectfully submitted,

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Its Counsel

June 11, 2002

TECHNICAL EXHIBIT

PETITION FOR RULE MAKING
TO AMEND THE FM TABLE OF ALLOTMENTS

FORT COLLINS, COLORADO
WHEAT RIDGE, COLORADO
WESTCLIFFE, COLORADO

Technical Narrative

This technical narrative and accompanying Figures have been prepared on behalf of station KTCL (FM), Fort Collins, Colorado, in support of a Petition for Rule Making to amend 47 C.F.R. Section 73.202(b) to reallocate channel 227 C at Fort Collins, Colorado to channel 227 C0 at Wheat Ridge, Colorado.

As the requested change is mutually exclusive with the channel's current allotment, Petitioner invokes the provisions of Section 1.420(i).

The following is a summary of the merits of this reallocation proposal:

- The community of Wheat Ridge, Colorado (2000 Census population 32,913 persons) will be provided with its first local aural transmission service.
- The community of Fort Collins, Colorado (2000 Census population 118,652 persons) will continue to have local aural service from three radio stations.
- The proposed channel 227 allotment site at Wheat Ridge, Colorado satisfies the Commission's allocations spacing rules.¹

¹ Proposed allotment coordinates are 39° 40' 18" North, 105° 07' 32" West. See this Exhibit under the heading "Compliance With FCC Rules" for details on allocations considerations with respect to this site. Also see *Figure 1* accompanying this Exhibit for the allocations spacing study.

- The channel 227 60 dbu loss area is well served by a number of radio services².

² See Figures 3 and 4.

Table of Figures Accompanying this Exhibit

| | |
|-----------|---|
| Figure 1 | Allocations Spacing Studies |
| Figure 1B | Coverage and location map, Channel 249A, substitution for Channel 227A at Westcliffe, Colorado. |
| Figure 2 | KTCL (FM) Channel 227 60 dbu Gain and Loss Areas |
| Figure 2B | KTCL (FM) Channel 227 60 dbu Gain and Loss Supplemental Depiction, FCC Flat Earth and Longley Rice Methods. |
| Figure 3 | Depiction of Services to KTCL 60 dbu loss area |
| Figure 4 | Tabulation of Services to KTCL 60 dbu loss area |
| Figure 5 | KTCL 227 Present and Proposed 70 dbu Service |

Proposed Change in the FM Table of Allotments

Fort Collins is located in Larimer County, Colorado, and has a 2000 U.S. Census population of 118,652 persons. Under this proposal, Fort Collins will continue to receive local aural radio service from the following stations:

- KCSU (FM)
- KIIX (AM)
- KPAW (FM)

Wheat Ridge, Colorado is located in Jefferson County, Colorado, and has a 2000 U.S. Census population of 32,913 persons. Wheat Ridge has no local FM or AM aural broadcast service and, therefore, Petitioner's proposal would bring a first local aural broadcast service to Wheat Ridge.

Accordingly, Petitioner requests modification of the FM allocation table as follows:

| <u>City</u> | <u>Present</u> | <u>Proposed</u> |
|------------------|----------------|--------------------|
| Fort Collins, CO | 227C, 300C1 | 300C1 ³ |
| Wheat Ridge, CO | - | 227C0 |
| Westcliffe, CO | 227A | 249A |

Compliance With FCC Rules

The attached *Figure 1* is a tabulation of required separations pertinent to use of channel 227 at Wheat Ridge, Colorado. The reference site complies with the Commission's minimum distance separations contained in Section 73.207 of the FCC's rules to all existing, authorized and proposed stations and allotments, with two exceptions:

1. The existing channel 227 class C allotment at Fort Collins, Colorado, for which this proposal is a mutually exclusive substitute, and

³ KCSU (FM) is a non-commercial educational channel and thus does not appear in the FM table of allotments. It will continue to provide service to Fort Collins.

2. A class A allotment on channel 227 at Westcliffe, Colorado. Petitioner counterproposes operation on channel 249A at Westcliffe. The channel 249A allotment site proposed herein is fully spaced⁴. While there would be a site restriction for channel 249A 9.3 kilometers southwest of Westcliffe, the site currently proposed is itself site restricted 9.3 km southwest. As demonstrated in *Figure 1A*, 70 dbu service would be provided to all of Westcliffe by this counterproposal on channel 249A.

Operation from the channel 227 reference site will provide the requisite city grade (70 dbu) signal to all of Wheat Ridge.⁵ *Figure 5* is a map which was developed using the 2000 U.S. Census Topologically Integrated Geographic Encoding and Referencing (TIGER) Line files which depicts the city grade coverage (70 dbu) contours based on class C0 facilities (ERP 100 kW/HAAT 450 meters) at the proposed allotment site. As shown, all (100%) of Wheat Ridge is located within the 70 dBu City Grade contour. Wheat Ridge is located 11.3 kilometers from the proposed KTCL channel 227 allotment site.

Urbanized Area Considerations

The KTCL (FM) 70 dbu contour currently encompasses 78 percent of the Denver Urbanized Area. Under this proposal, the KTCL 70 dbu contour will encompass 100% of that Urbanized Area.⁶

60 dbu Gain and Loss Areas

As determined using the Flat Earth Model generally accepted by the Commission for allocations proceedings, there are currently 2,798,869 persons residing within the KTCL (FM) channel 227C 60 dbu contour. There will be 2,644,106 persons residing within the proposed KTCL 227C0 60 dbu contour. 2,481,749 persons currently residing within the KTCL 60 dbu contour will continue to receive service under this proposal. 317,120 persons currently residing within the KTCL 60 dbu contour will lose service.

⁴ Proposed allotment coordinates: 38° 03' 21" North, 105° 30' 02" West, see *Figure 1* for the allocations spacing study at that site.

⁵ See *Figure 5* herein.

⁶ See *Figure 5*.

162,357 persons will gain new service within the proposed KTCL 60 dbu contour. See Figure 2.

While it would appear from this analysis that 154,763 persons would lose 60 dbu service from KTCL, in this case this loss of service is an illusion. Due to the severe mountainous terrain around both the present and proposed transmitting sites, a flat earth model does not provide a good representation of actual service expected.

Accordingly, Figure 2B was prepared, demonstrating expected real world service as determined utilizing the Longley-Rice coverage model. This model yields significantly different results: using actual terrain, the proposed 60 dbu contour will encompass 2,825,340 persons, whereas the current 60 dbu contour only encompasses 2,781,360 persons. 2,258,194 persons currently residing in the KTCL 60 dbu contour (as determined utilizing the Longley-Rice method) will continue to receive service. 21,166 persons residing within this contour will lose service, and 67,146 persons will gain new service within the proposed KTCL 60 dbu contour, for a net gain of 43,980 persons receiving 60 dbu service from KTCL as determined using the Longley-Rice methodology.

A summary of the 60 dbu area and population gains and losses resulting from this proposal, as determined by both methods, is tabulated below:

Table 1: KTCL-FM 60 dbu Proposed Gain and Loss

| | FCC Flat Earth | | Longley-Rice | |
|---------------------------|----------------|------------------|--------------|---------------|
| | Area | pop | Area | Pop |
| Proposed | 21,819 | 2,644,106 | 15,265 | 2,825,340 |
| Overlap | 10,072 | 2,481,749 | 11,867 | 2,758,194 |
| Gain | 11,747 | 162,357 | 3,398 | 67,146 |
| Existing | 15,786 | 2,798,869 | 15,966 | 2,781,360 |
| Overlap | 10,072 | 2,481,749 | 11,867 | 2,758,194 |
| Loss | 5,714 | 317,120 | 4,099 | 23,166 |
| Total gain (loss): | | (154,763) | | 43,980 |

The 60 dbu loss area related to the reallocation of channel 227 as determined using either method is well served by many aural services. See Figures 3 and 4.

Coverage Contours

Except as noted in *Figure 2B*, which provides a coverage comparison using two methodologies, the FM predicted coverage contours provided with this Exhibit were calculated in accordance with the provisions of 47 C.F.R. Section 73.313, except that, in accordance with current FCC practice, uniform terrain was assumed in all directions.

Population and Area

The population within the FM primary service contour (1 mV/m) was calculated using a computer program that utilizes the 2000 U.S. Census database of "population centroids". The program adds the populations of those U.S. Census designated areas whose centroid lies within each service area.

Conclusion

Channel 227 can be reallocated from Fort Collins, Colorado to Wheat Ridge, Colorado, in compliance with all applicable Commission rules. The community of Wheat Ridge, Colorado would be provided with a first local aural transmission service, and the community of Fort Collins, Colorado will continue to have local aural service. No service will be lost in any underserved area⁷ and no new underserved areas will be created as a result of this proposal. Westcliffe, Colorado would continue to have available a new FM allotment, on channel 249A. Therefore, Petitioner requests the reallocation of channel 227 from Fort Collins, Colorado to Wheat Ridge, Colorado be granted accordingly.

Respectfully submitted,



Stephen G. Davis

⁷ Defined as an area receiving service from less than five aural broadcast services. In the case of this proposal, the 60 dbu loss areas will continue to receive 60 dbu service from multiple sources, local and distant ... see Figures 3 and 4.

Channel 227, Fort Collins, Colorado and Wheat Ridge, Colorado

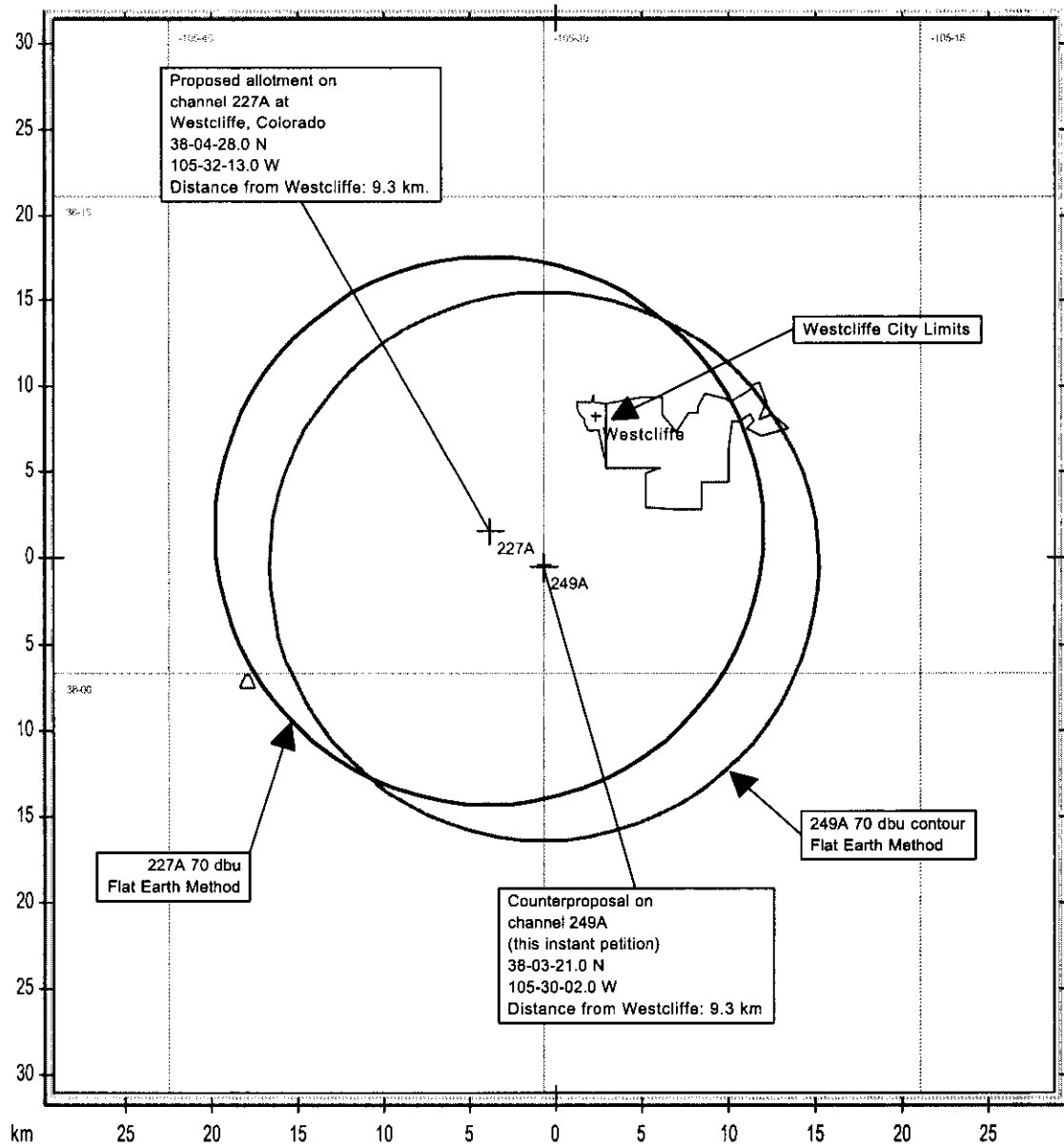
Senior Vice President
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June 4, 2002

² Substitute channel 249A at 38-03-21N, 105-30-02W, fully spaced.

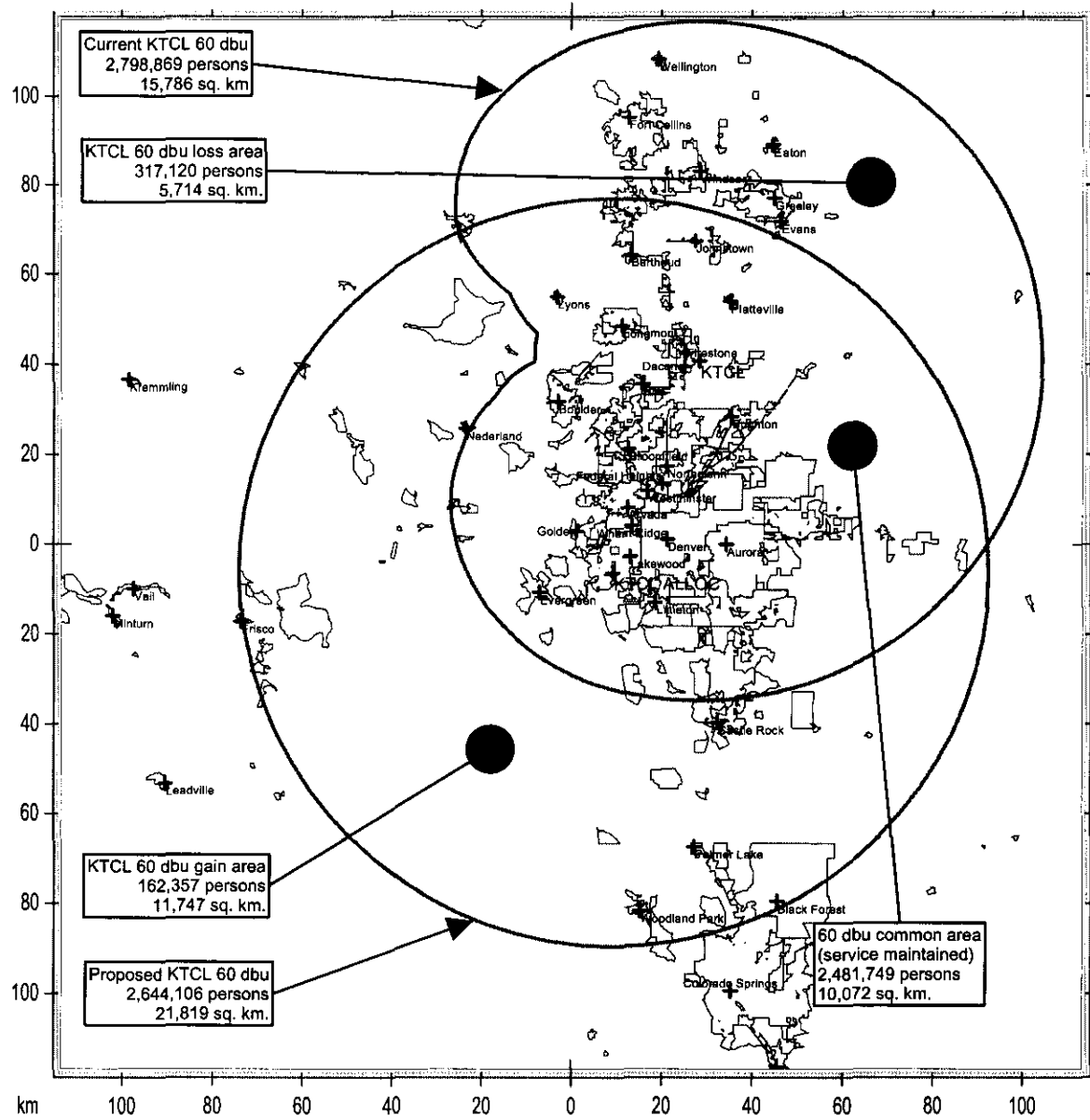
Westcliffe, Colorado Counterproposal



Site Locations and 70 dbu Coverage

State Borders City Borders Lat/Lon Grid

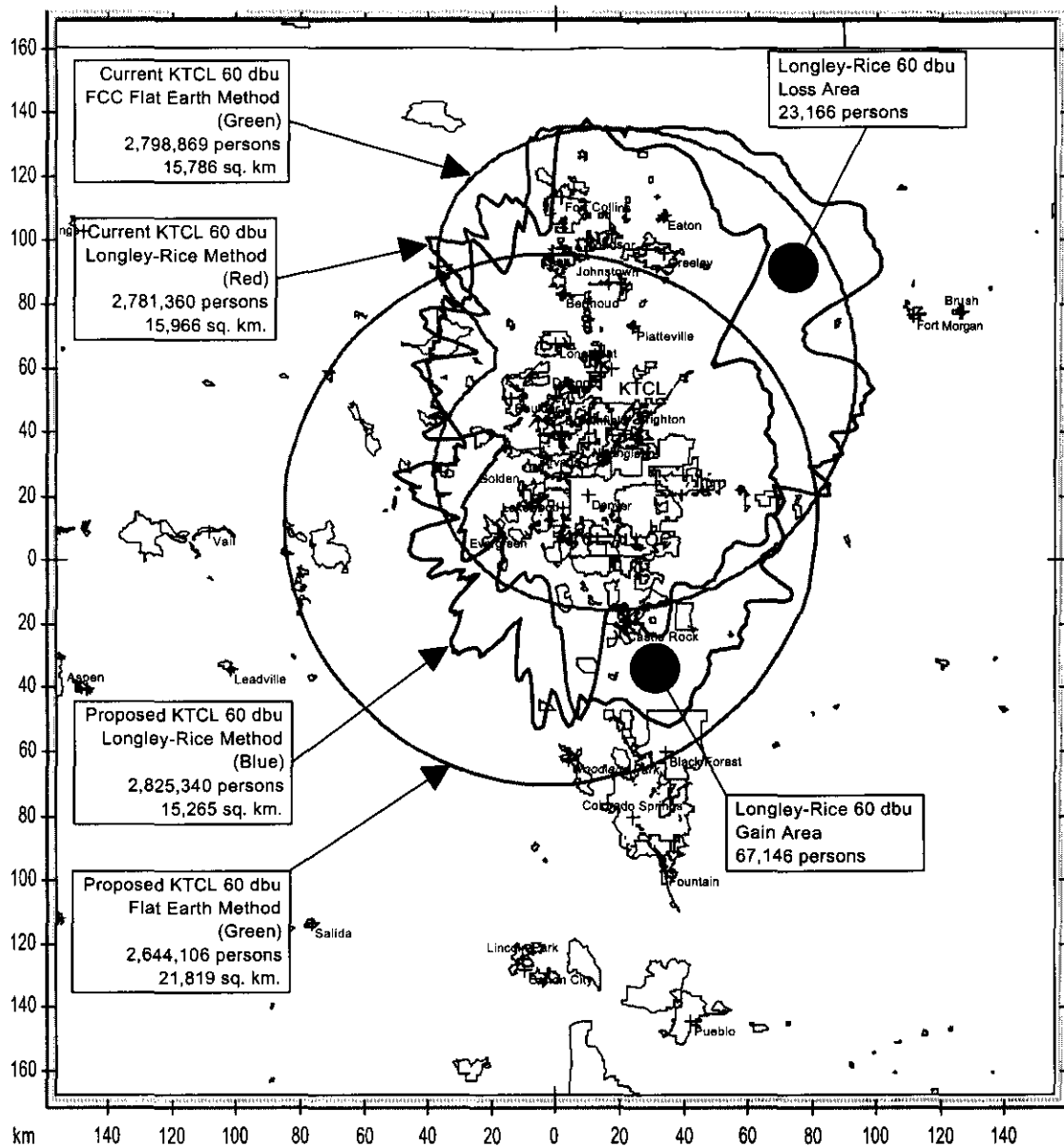
60 dbu Gain and Loss Areas



2000 Census Data

State Borders City Borders

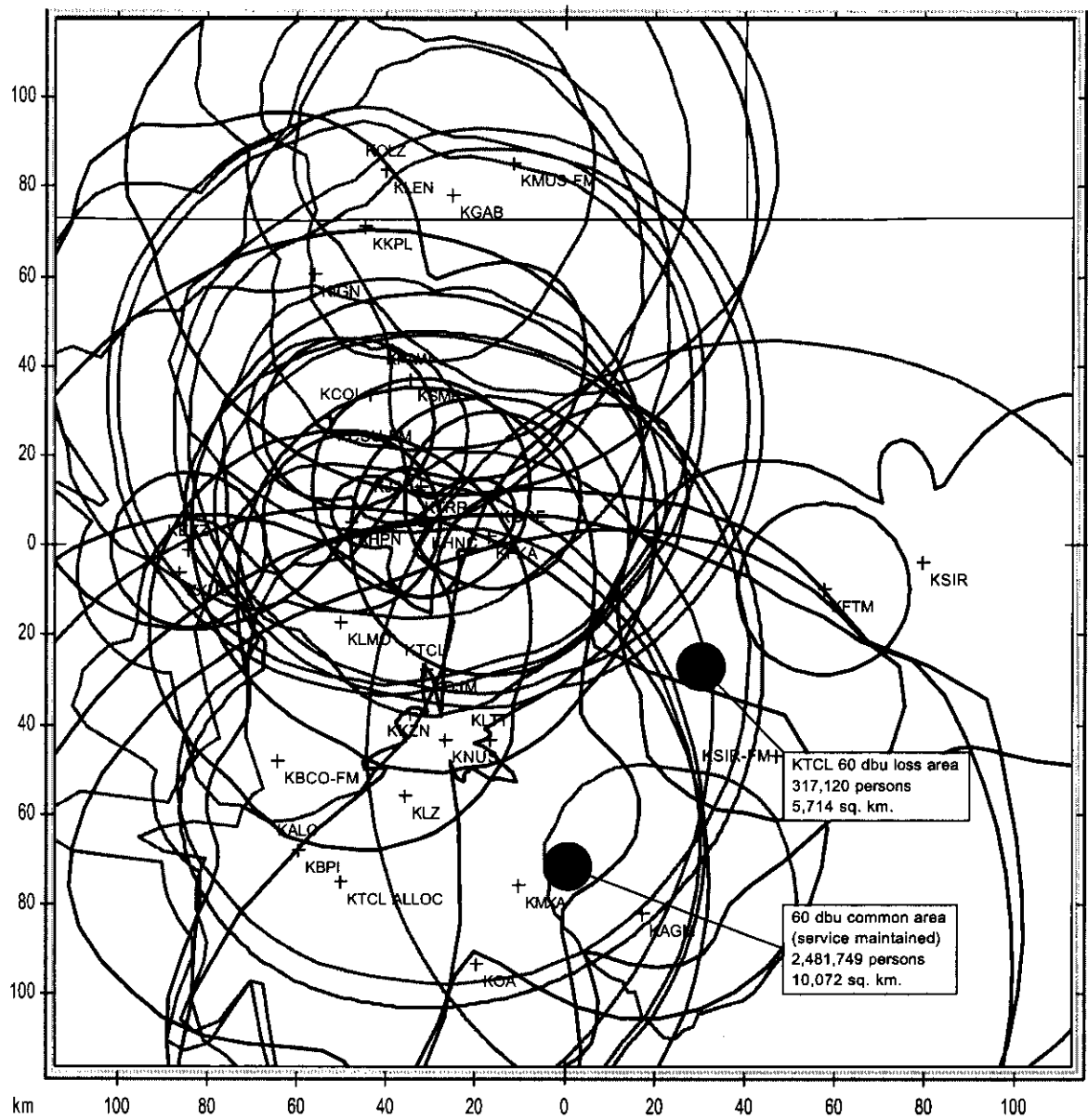
60 dbu Coverage Comparisons



FCC Flat Earth Method vs. Longley-Rice Method

State Borders City Borders

Service to 60 dbu Loss Area



Green: FM; Blue: AM

State Borders

Exhibit 4: Tabulation of Services to 60 dbu Loss Area.

| <i>Call Sign</i> | <i>State</i> | <i>City</i> | <i>Freq</i> | <i>Channel</i> | <i>ERP_w</i> |
|------------------|--------------|-------------|-------------|----------------|--------------|
| KBPI | CO | DENVER | 106.7 | 294 | 100000 |
| KBCO-FM | CO | BOULDER | 97.3 | 247 | 94000 |
| KALC | CO | DENVER | 105.9 | 290 | 99000 |
| KKPL | WY | CHEYENN | 99.9 | 260 | 50000 |
| KXUU | CO | ESTES PA | 102.1 | 271 | 25000 |
| KIGN | WY | CHEYENN | 97.9 | 250 | 100000 |
| KCSU-FM | CO | FORT COL | 90.5 | 213 | 10000 |
| KOLZ | WY | CHEYENN | 100.7 | 264 | 97000 |
| KLEN | WY | CHEYENN | 106.3 | 292 | 8700 |
| KAGM | CO | STRASBUI | 102.3 | 272 | 6000 |
| KPAW | CO | FORT COL | 107.9 | 300 | 100000 |
| KUNC-FM | CO | GREELEY | 91.5 | 218 | 100000 |
| KUAD-FM | CO | WINDSOR | 99.1 | 256 | 100000 |
| KTRR | CO | LOVELANI | 102.5 | 273 | 50000 |
| KDJM | CO | BROOMFII | 92.5 | 223 | 57000 |
| KSME | CO | GREELEY | 96.1 | 241 | 100000 |
| KMUS-FM | WY | BURNS | 101.9 | 270 | 50000 |
| KSIR-FM | CO | BRUSH | 107.1 | 296 | 92000 |
| KBRU-FM | CO | FORT MOI | 101.5 | 268 | 92000 |
| KLMO | CO | LONGMON | 1060 | | 10000 |
| KCOL | CO | WELLINGT | 600 | | 5000 |
| KIIX | CO | FORT COL | 1410 | | 1000 |
| KHPN | CO | LOVELANI | 1570 | | 1000 |
| KEZZ | CO | ESTES PA | 1470 | | 1000 |
| KOA | CO | DENVER | 850 | | 50000 |
| KNUS | CO | DENVER | 710 | | 5000 |
| KLTT | CO | COMMERCI | 670 | | 50000 |
| KLZ | CO | DENVER | 560 | | 5000 |
| KMXA | CO | AURORA | 1090 | | 50000 |
| KHNC | CO | JOHNSTO | 1360 | | 10000 |
| KJJD | CO | WINDSOR | 1170 | | 1000 |
| KGRE | CO | GREELEY | 1450 | | 1000 |
| KHNC | CO | JOHNSTO | 1360 | | 500 |
| KKZN | CO | THORNTON | 760 | | 50000 |
| KFKA | CO | GREELEY | 1310 | | 5000 |
| KGAB | WY | ORCHARD | 650 | | 8500 |
| KFTM | CO | FORT MOI | 1400 | | 1000 |
| KSIR | CO | BRUSH | 1010 | | 25000 |

Figure 5
 KTCL Present and Proposed
 Principal Community Contours
 (70 dbu)
 FCC Flat Earth Model

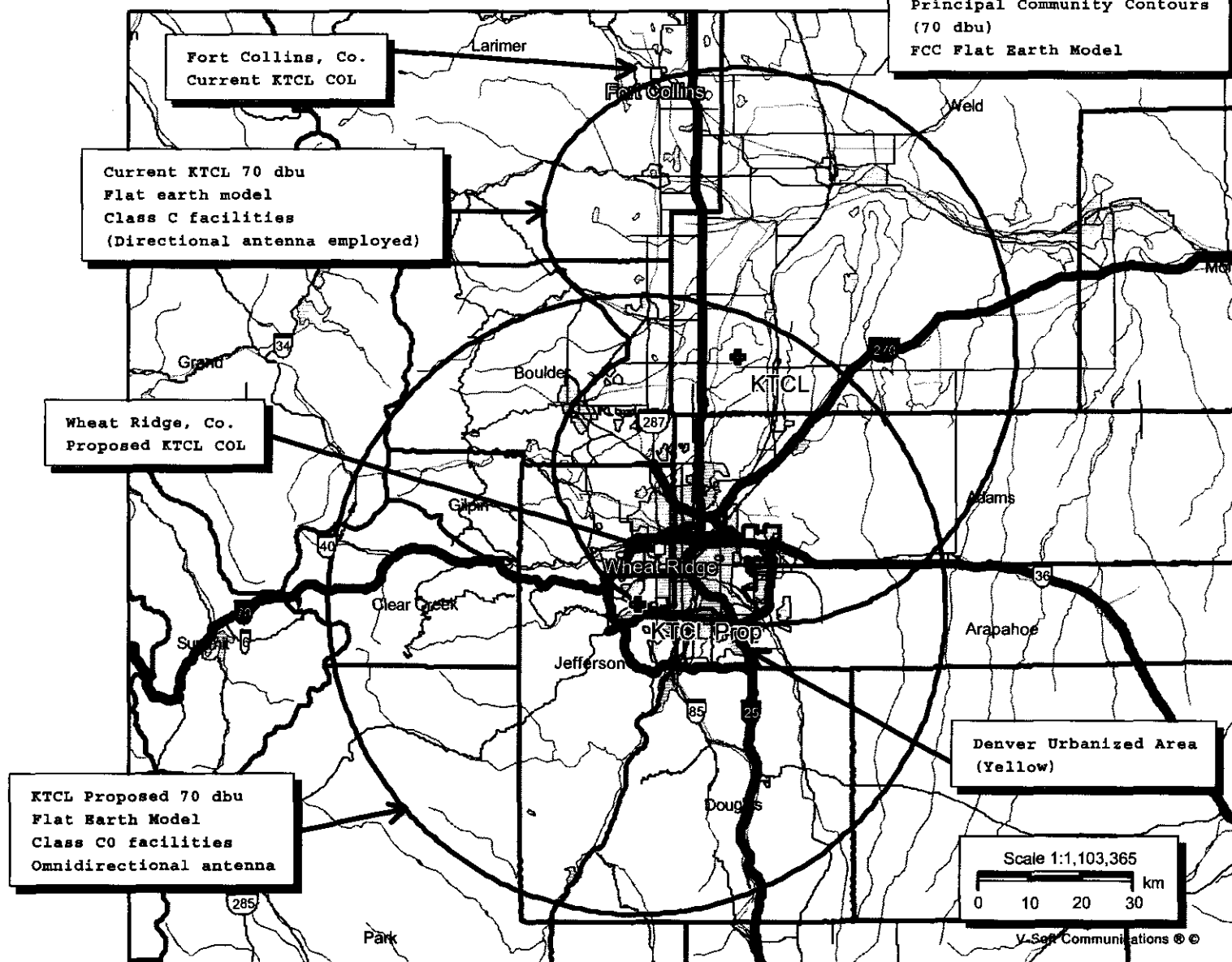


EXHIBIT 1

U.S. Census Bureau

American FactFinder

Main | Search | Feedback | FAQs | Glossary



Quick Tables

QT-P3. Race and Hispanic or Latino: 2000

Data Set: Census 2000 Summary File 1 (SF 1) 100-Percent Data

Geographic Area: Wheat Ridge city, Colorado

NOTE: For information on confidentiality protection, nonsampling error, and definitions, see <http://factfinder.census.gov/home/en/data/notes/expsf1u.htm>.

| Subject | Number | Percent |
|--|--------|---------|
| RACE | | |
| Total population | 32,913 | 100.0 |
| One race | 32,075 | 97.5 |
| White | 29,361 | 89.2 |
| Black or African American | 275 | 0.8 |
| American Indian and Alaska Native | 309 | 0.9 |
| American Indian | 238 | 0.7 |
| Alaska Native | 1 | 0.0 |
| Both American Indian and Alaska Native | 0 | 0.0 |
| American Indian or Alaska Native, not specified | 70 | 0.2 |
| Asian | 450 | 1.4 |
| Asian Indian | 34 | 0.1 |
| Chinese | 60 | 0.2 |
| Filipino | 26 | 0.1 |
| Japanese | 129 | 0.4 |
| Korean | 55 | 0.2 |
| Vietnamese | 81 | 0.2 |
| Other Asian category | 56 | 0.2 |
| Two or more Asian categories | 9 | 0.0 |
| Native Hawaiian and Other Pacific Islander | 38 | 0.1 |
| Native Hawaiian | 14 | 0.0 |
| Samoan | 4 | 0.0 |
| Guamanian or Chamorro | 7 | 0.0 |
| Other Pacific Islander category | 13 | 0.0 |
| Two or more Native Hawaiian or Other Pacific Islander categories | 0 | 0.0 |
| Some other race | 1,642 | 5.0 |
| Two or more races | 838 | 2.5 |
| Two races including Some other race | 328 | 1.0 |
| Two races excluding Some other race, and three or more races | 510 | 1.5 |
| Two races excluding Some other race | 452 | 1.4 |
| Three or more races | 58 | 0.2 |
| HISPANIC OR LATINO | | |
| Total population | 32,913 | 100.0 |
| Hispanic or Latino (of any race) | 4,434 | 13.5 |
| Mexican | 2,569 | 7.8 |
| Puerto Rican | 58 | 0.2 |
| Cuban | 22 | 0.1 |
| Other Hispanic or Latino | 1,785 | 5.4 |
| Not Hispanic or Latino | 28,479 | 86.5 |
| RACE AND HISPANIC OR LATINO | | |
| Total population | 32,913 | 100.0 |
| One race | 32,075 | 97.5 |
| Hispanic or Latino | 4,088 | 12.4 |
| Not Hispanic or Latino | 27,987 | 85.0 |
| Two or more races | 838 | 2.5 |
| Hispanic or Latino | 346 | 1.1 |

Detailed Tables

C

P046. PLACE OF WORK---PLACE LEVEL - Universe: Workers 16 years and over
Data Set: 1990 Summary Tape File 3 (STF 3) - Sample data

NOTE: For information on confidentiality, sampling error, nonsampling error, and definitions, see <http://factfinder.census.gov/home/en/datanotes/expstf390.htm>.

| | Wheat Ridge city, Colorado |
|-----------------------------------|----------------------------|
| Living in a place: | |
| Worked in place of residence | 3,079 |
| Worked outside place of residence | 11,588 |
| Not living in a place | 0 |

U.S. Bureau of the Census
1990 Census of Population and Housing

Standard Error/Variance documentation for this dataset:
[Variance Document for STF 3 \(PDF 84KB\)](#)

City State / ZIP Code Associations

To find the ZIP Code for a mailing address, check out our [ZIP+4 Code Lookup](#).
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wheat ridge, co

WHEAT RIDGE CO

is associated with the
following ZIP Codes:

For these ZIP Codes,
the city name is:

ZIP Code
Type

| | | |
|-------|----------------------|----------|
| 80002 | ACCEPTABLE | STANDARD |
| 80033 | ACCEPTABLE (DEFAULT) | STANDARD |
| 80034 | ACCEPTABLE (DEFAULT) | STANDARD |
| 80212 | ACCEPTABLE | STANDARD |
| 80214 | ACCEPTABLE | STANDARD |
| 80215 | ACCEPTABLE | STANDARD |
| 80403 | ACCEPTABLE | STANDARD |

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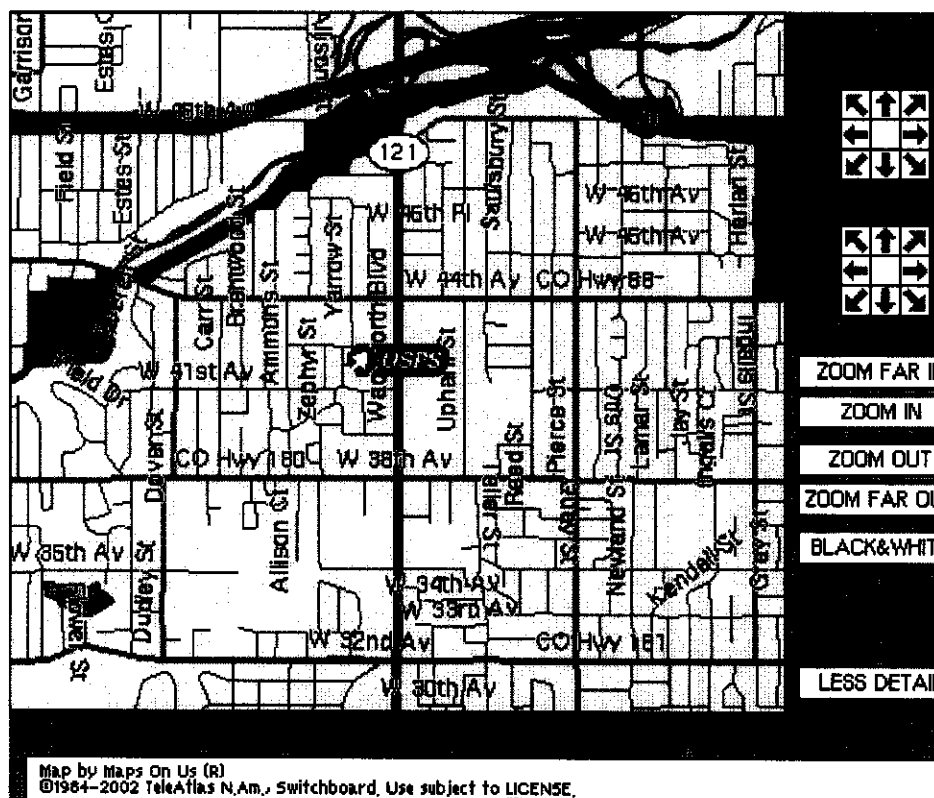
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